

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

Plaintiff

v.

HILTON THOMAS

Defendant

Action No. WMN-0355

COURT AT BALTIMORE
GENERAL DISTRICT OF MARYLAND

JUN 10 2020

FILED
LOGGED
ENTERED
RECEIVED

DEPUTY

CLAIM FOR COMPASSIONATE RELEASE
REDUCTION IN SENTENCE (per 18 U.S.C §§ 3582
and 4205(g))

Comes now Hilton Thomas in good faith for good cause shown, do hereby request for this Honorable Court to return an order granting him a Compassionate release on the grounds as follows:

- 1.) Hilton Thomas is currently 40 yrs old, an inmate detained at FCI Berlin, located at 1 Success Loop Road Berlin, New Hampshire 03570.
- 2.) Hilton Thomas have been incarcerated for the past 22 yrs 7 months, since the age of 17. Unfortunately, his health has taken a turn for the worst. Hilton Thomas is currently suffering from a life threatening heart illness, which indicates irregular beats and poor blood circulation, which remains a constant, daily struggle as he have to experience dizziness often from the lack of oxygen flow to the brain, irreparable at FCI Berlin. Duly noted Hilton Thomas have been denied administrative relief by FCI Berlin administration concerning his well being safety. [Please See * Exhibit-A]
- 3.) As of the recent date: May 26, 2020 Hilton Thomas has undergone heart monitor ~~at~~ tests while housed at FCI Berlin for his abnormal heart responses. Subsequently, FCI Berlin is not equipped

With the proper staff or equipment to facilitate him or provide any potential emergency service for his current heart condition at any given time of this crisis, if required. FCI Berlin's very location poses a threat to the life of Hilton Thomas for any such emergency transfer factor. Even when he requested a transfer to another facility that may be more helpful for ~~my~~ his condition, he was denied due to "Medical hold" placed upon him.

4.) Hilton Thomas has been told by Ms. Pedersen, P, MD that his liver is of great concern after he had blood work done.

5.) Hilton Thomas has also ~~has~~ been experiencing high blood pressure fluctuation for some^{time} and doing his best to keep it in control from learning from family members and books (medical) how to help keep it balanced. He has borderline High Blood Pressure.

6.) Considering the above stated issues at hand, there now exists a heightened risk factor of Covid 19 within New Hampshire state. Recent statistics have shown, approximately 38 Federal Prisoners have died since May 5th, 2020, and approx. "1,900" who've tested positive for Covid 19. Surprisingly, within a "24 hr." period at FCI Berlin, the inmate population are locked down in shared cells (with "2" inmates) for approximately "22⁺ hrs" daily, and offered "2 hrs" to shower and practice "social distancing." Consequently, the mode~~l~~ operation of FCI Berlin prison lockdown is a danger and a hazard for Hilton Thomas heart condition and other issues of health, surely this Honorable Courts intervention is needed now more than ever.

FCI Berlin's Warden Robert Hazelwood has not informed the inmates of any other inmates or FCI Berlin staff ~~members~~ members who may have since tested positive for COVID 19. More is the fact that, Considering Hilton Thomas

current heart condition and other issues, coupled along with ~~the~~ the stated FCI Berlin's "Model" Lockdown, by 'default', "Social distancing" can't occur. Additionally, if COVID19 became air-born at this facility during this "Model" lockdown process, by 'default', inmates would/will consume the same airborne virus (pathogens) and be damaged goods subjected to the current COVID19 climbing record trajectory.

7.) Hilton Thomas early release would not pose a danger to the community for several reasons; 1.) He has changed totally with sincere devotion and commitment to be an productive citizen in society. The crimes that he have committed in the past, he will NEVER do again or either think of doing, surely he's no longer a criminal minded human, as he has vowed to spend the rest of his submitting his will totally to God with the best of his ability. Crime of life is not an option for Hilton Thomas, as he greatly regret every wrong act he's ever did in his life, and has repented to God for them all and now holds a pure heart to never repeat any crimes, and strive to spend the remaining of his life doing what's pleasing to God, and what's helpful to our society. 2.) The 22 years 7 months of incarceration, has really help made Hilton Thomas to be a man, as he is not the child he was upon entering prison. He holds no danger to the community because he has learned within the 22 yrs of incarceration his purpose in life and that is firstly to worship God, do good deeds, have good character, good manners and the right intentions. He pose no threat to any one because he's innocuous and fear God. He pose no threat to the community because he crave the desire to do all that he can do to uplift the community and ^{help} others to avoid the life of crime, especially at risk youth, which he has formed an youth foundation program for at risk youth [Please See Exhibit-1]. 3.) Hilton Thomas

pose no threat or danger to the community because he will be returning as a man who has been rehabilitated. 4.) He pose no danger to the Community for the above mentioned reasons, many other reasons and simple as this, Hilton Thomas has prayed daily for change, a pure heart and beneficial knowledge that I'll implement for the rest of my life and share with others along the way. He (Hilton Thomas) pose NO danger to the community what so ever, recidivism has no space in Hilton Thomas life, it's not an option. He learnt his lessons.

8.) Hilton Thomas has utilized much of his ^{time} to correct himself while incarcerated. He has accomplished many goals, GED, many other programs while being in the BOP as means to have himself equipped with the needed tools for a better and progress life style to live. [Please see enclosed Progress Report] Exhibit B

9.) Hilton Thomas Reentry Plan is as follow: He has a home to reside with his Fiancee Ms. Deitra Williams 4215 Nichols ave Baltimore, Md. 21206. He plan to Marry upon release, God willing. I plan to support myself financially through means from working at the jobs I'll work, starting work my 2nd day home God willing. The jobs that I ^{have} available ~~are~~ are 1.) Crab City Seafood 2750 W. Franklin street, Baltimore, Md. Supervisor Lashawn Williams (410) 945-2722 2.) DVJ Express Trucking 10234 Liberty Rd. Randallstown, Md. Supervisor: Brenda Doyle (410) 849-6767. 3.) Family Cleaning Service, as I'll be the Janitor, then my family wish for me to be the Manager, Maurice Powell (410) 790-0091. Each of these companies I will work for until ~~is~~ my own business is up and successful. I plan to complete my College Course for Business Management thru Federal programs that available for ex offenders from Federal Prison, which provide grants. Also, my short term goal is to get my youth foundation up and running, O.U.R.S Foundation [see Attached EX. 5]. I plan to do a documentary on my life, as a reminder and deterrence for others

to never live the life of crime. I have a host of support, family, friends and others who's willing and ready to help me upon reentry, whom all are positive, productive citizen. To name a few: James L. Tisdale, Sherell Tisdale, Niya Thomas, Janyetta Webb, my children Sheyoka Coleman and many others. It's my plan to spend the rest of my life worshipping God, working, spending time at home with my wife, time with my ⁽³⁾ children who are now grown adults as I wish to get to know them as we all desire and pray to get to know one another. I will spend time as often as possible with my two grandchildren, to be there with them and for them which I wasn't with my kids due to my ignorant and foolish decisions of the life of crime.

I will obtain my health care needs from the local Social Services in my area.

I wish to also help ~~to~~ take care of my Grandmother who's suffering from Alzheimers as she's very old now, in her 90's.

On these grounds stated and affirmed, Hilton Thomas prays this Honorable court issue a compassionate release order expeditiously for "good cause" shown.

Affiant further saith naught

Respectfully executed this 29th day, in the month: May, 2020.

Hilton Thomas Fed. #33062-037

FCI Berlin

1 Success Loop Road / P.O. Box 9000
Berlin, New Hampshire 03570

Certificate of Service

This is to certify the stated "Claim for Compassionate Release" was prepared and forwarded to the FCI Berlin mailroom staff this 2nd day, in the month: ^{June} ~~June~~, 2020 to be sent by "special mail" to the below referenced recipient:

* Attention Clerk's Office

United States District Court of Maryland
101 W. Lombard Street
Baltimore, Maryland 21201-2691

Hilton Thomas

Hilton Thomas